

Office of the Chapter 13 Standing Trustee

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June 25, 2024

The Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

**RE: Chapter 13 Bankruptcy
Case No. 23-11819 (ABA)
Debtor(s) Name: Uzziel Prudencio-Palmero**

Dear Judge Altenburg:

Please accept this letter in lieu of a more formal objection to Debtor's Motion to Vacate Dismissal Order, which is returnable Tuesday, July 2, 2024, at 10:00 a.m.

Debtor's case was confirmed on July 26, 2023, at \$1,200 paid to date, then \$498 for 56 months. On June 5, 2024, the Court entered an Order Dismissing Case for failure to submit plan payments. Two (2) days later, Debtor files a Motion to Vacate Dismissal Order stating there was confusion as to the requirement to continue to make Trustee and mortgage payments. Debtor proposes to cure the plan arrears immediately upon reinstatement.

Debtor has not submitted a plan payment to the Trustee in almost ten (10) months. The last payment received was on September 6, 2023. By the return date of Debtor's motion, another plan payment will be due, and the arrears will total \$3,857. Debtor has not provided any evidence that funds needed to cure the plan arrears are readily available and/or have been delivered to counsel.

Absent proof that Debtor can bring the plan payments current and will agree to submit all future payments via wage order, the Trustee requests that Debtor's motion be denied.

As always, please feel free to contact this office with any questions or concerns.

Respectfully submitted,

s/ Joni L. Gray

Joni L. Gray
Counsel for Andrew B. Finberg,
Chapter 13 Standing Trustee

JLG/jpa

cc: John D. DiCiurcio (Via email & ECF/CM)
Uzziel Prudencio-Palmero (Via First Class Mail)